



## **Declaration of Interests Policy**

### **1. Introduction**

As a matter of good governance, BAPEN requires that members who participate in BAPEN activities and decisions declare any interests that may conflict with their BAPEN work. This document defines the formal process for declaring any relevant interests.

Whilst conflicts of interest are rare, it is nevertheless possible that they could happen and could impact adversely on the reputation of BAPEN and therefore it is appropriate to have a formal procedure. We wish to avoid creating a bureaucracy that requires detailed record keeping that is difficult to maintain and intrusive and aim to have a proportionate approach that collects enough information to assure BAPEN members that conflicts of interest are assessed, recorded and mitigated where present.

### **2. Who this affects**

- BAPEN wishes to follow the advice of the Charity Commission and ask trustees, members of Council, Executive, Standing Committees and Special Interest Groups and members working on activities under the auspices of BAPEN, including those involved in producing guidelines and recommendations, contributing to conferences and postgraduate meetings, to declare personal interests.
- For the purpose of this document such people are called BAPEN Contributors.
- BAPEN Core Groups are independent organisations and should all have their own arrangements for collecting declaration of interest details from their committee members. Chairs/nominated deputy of Core Groups will declare their interests as members of BAPEN Council.

### **3. Purpose of the Policy**

The intention of this policy is to ensure that conflicts of interest are identified and recorded so that discussion of any issue, or publication of any BAPEN document can proceed in the knowledge of such interests and take account of them.

The test of what constitutes a relevant interest will be whether a reasonable third party would be likely to consider that the objectivity of the person's views or conduct might be affected or influenced by that interest or, in the case of BAPEN contributors who work in industry, if their employment may impact on their perceived objectivity or compromise commercial sensitivity during discussions.

### **4. The Policy**

#### **4.1. Good Standing**

In addition to declaring any conflicts, it is important that BAPEN are assured that all registered professionals working on their behalf are of good standing in terms of registration with their regulatory body. BAPEN will collect a declaration of good standing (Appendix 1) from all registered professionals when they are appointed to a role that is considered a BAPEN

contributor and thereafter annually, and a copy of this will be kept on the secure BAPEN electronic shared drive.

#### 4.2. Operational protocol

- All members of BAPEN Executive, Council and trustees will be asked to declare any interests to the BAPEN Honorary Secretary. Interests should be declared via email at the time they arise; in addition a declaration of interests register will be circulated at all Council and trustee meetings. The Declaration of Interest Register will be maintained by the BAPEN Honorary Secretary and will be stored on the secure BAPEN electronic shared drive.
- Standing Committee and Special Interest Groups chairs should ensure a Declaration of Interest Register is maintained for their committee in the same manner. This register should be sent to the BAPEN office after each committee meeting so that the latest version can be stored on the secure BAPEN electronic shared drive.
- Declarations related to BAPEN document publication should be collated by the lead author of the document, or chair of the committee responsible for the publication, and be submitted alongside the completed document to the BAPEN Honorary Secretary using the Declaration of Conflict of Interests for Publications form (Appendix 2) prior to publication. Any relevant declarations must also be included within the body of the publication.
- The BAPEN office will coordinate collecting declaration of good standing when new members of Executive and Council are appointed, and these will be stored on the secure BAPEN electronic shared drive. Standing Committee and Special Interest Group Chairs should collect declarations of good standing from their committee members and forward the completed declarations to the BAPEN office for storing on the secure BAPEN electronic shared drive.
- The BAPEN Programmes Committee will, via the BAPEN Conference organisers, coordinate maintaining a Declaration of Interest Register for individuals invited to present at the annual conference.

#### 4.3. Disclosure of interests

In completing a Declaration of Interest, an individual should be mindful of any interest that could potentially conflict with or prejudice his or her independence and objectivity in performing their BAPEN role. Completion of this declaration will be a condition of such involvement in BAPEN activities.

An interest is any arrangement which constitutes a current **significant** benefit to the individual or immediate family concerned, such as any financial benefit to the person, hospital, practice, faculty or department in which they are employed and also membership of any organisation whose interests might conflict from time to time with BAPEN. Generally, but not exclusively, the situations might include:

- Sponsorship or payment of expenses by commercial organisations.
- Donations, sponsorship or similar from pharmaceutical firms and equipment manufacturers.
- Consultancies and fees paid.
- Patents (existing or pending) held by the individual or department.
- Holding of shares in commercial organisations (e.g. pharmaceutical/equipment manufacturers), including relevant shareholdings by family members that could have a bearing on objectivity.

- Membership of any national body, charity or pressure group, or advisory board.
- Editorial responsibility including payment for publications (written or electronic).
- Membership of any political party or private organisation that could have a bearing on the work of BAPEN.

It will be the responsibility of each individual to maintain the accuracy and timeliness of their declarations, and to notify any changes. If a new interest arises he or she should notify the BAPEN Honorary Secretary as soon as possible providing details via email.

#### **4.4. Review of Declaration of Interest**

Declaration of interest will be a standing agenda item at every board, committee, or working party meeting. If a member realises that there may be a conflict only when an item starts to be discussed, they should declare it at that point.

Once an interest has been declared, it will be for the chair of the meeting to decide whether the individual should leave whilst the item is discussed; or whether discussion should continue with the member present but with all aware of the potential for conflict; or whether some other course of action is more appropriate. The outcome of this decision should be included in the meeting minutes. If the chair declares an interest they should nominate a deputy to chair that agenda item.

**Date of Policy:** February 2015

**Date of Review:** June 2025

## Appendix 1

<https://www.bapen.org.uk/declaration-of-good-standing>

Declaration of Good Standing (to be completed by professionally registered BAPEN contributors)

I confirm that my name is not currently removed, suspended, or withdrawn from my regulatory body Register in any country.

I understand that it is my responsibility to inform BAPEN, if during my tenure of office, my name is removed, other than by voluntary erasure (such as because of retirement) from the regulatory body register in any country.

I note that BAPEN reserves the right to withdraw membership of any committee or honorary appointment.

Name (including title):

Signature:

Date:

## Appendix 2

<https://www.bapen.org.uk/declaration-of-interest>

### **BAPEN Council – declaration of potential conflict of interests register**

BAPEN Council members are requested to provide declaration of potential conflict that is recorded on the BAPEN Declaration of Interests Register:

Such declarations would include:

- Remunerated employment, professions, directorships and offices with relevance to nutritional care
- Unremunerated employment, professions, directorships and offices with relevance to nutritional care
- Significant shareholding / partnership in companies involved in the provision of nutritional care (where your interest exceeds 5% of capital or where income derived exceeds 2.5% of your income)
- Relevant grants received in relation to research into or provision of nutritional care
- Any expenses / gifts valued at over £100 received from 3<sup>rd</sup> parties with an interest in the provision of nutritional care

## DEFINITIONS

### Personal financial interest

Any consultancy, directorship, position in or work (which is specific to the product or matter being discussed) in the commercial sector that attracts regular or occasional payments or benefits in kind such as hospitality.

- Clinicians receiving payment from the commercial sector for undertaking a procedure while giving advice on that procedure to BAPEN
- Any fee-paid work commissioned by the commercial sector for which the individual receives payment or financial benefit in kind
- Any shareholdings in the commercial sector held by the individual
- A financial interest in a company's product that is, or may become, a competitor to the product under consideration
- Expenses or hospitality provided by the commercial sector beyond that reasonably required for accommodation, meals and travel to attend meetings and conferences as set out in the BAPEN Expenses Policy
- Funds which include investments in the commercial sector that are held in a portfolio where the individual has the ability to instruct the fund manager as to the composition of the fund

### Non-personal financial interest

- A grant from a company for the running of a unit or department where the individual is employed
- A grant or fellowship or other payment to sponsor a post or member of staff in the unit where the individual is employed
- The commissioning of research or other work by, or advice from, staff who work in a unit where the individual is employed

### Personal non-financial interest

- A clear opinion, reached as the conclusion of a research project, about the clinical and/or cost effectiveness of an intervention under review.
- A published statement in which the individual has expressed a clear opinion about the matter under consideration, which could reasonably be interpreted as prejudicial to an objective interpretation of the evidence.
- Authoring or co-authoring a document submitted as an evidence publication to an advisory committee
- Holding office in a professional organisation (any organisation engaged in the medical, public health or social care sectors including the medical, nursing and midwifery Royal Colleges, NHS organisations, and universities), charity or advocacy group with a direct interest in the matter under consideration.
- Other reputational risks in relation to a matter under review